



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JN/DKK  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 4, 2020

By Email and ECF

Michael Levy  
Joan M. Loughnane  
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David Bitkower  
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Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

This discovery is only being provided to Huawei Technologies Co., Ltd. and Huawei Device USA Inc. Although Huawei Device Co. Ltd. and Futurewei Technologies, Inc. are newly indicted defendants in this case, neither is entitled to this discovery both because they have not yet appeared in the case and because they are not a party to the protective order.

I. The Government's Discovery

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Documents Associated with Requests Made to the Defendants by U.S. Government Agencies	Discovery Material	DOJ_HUAWEI_B_0000005756 - DOJ_HUAWEI_B_0000005787
Financial Institution Document	Discovery Material	DOJ_HUAWEI_B_0000005788
Documents Related to Activities in Iran	Discovery Material  Sensitive Discovery Material	DOJ_HUAWEI_B_0000005789 - DOJ_HUAWEI_B_0000005803  DOJ_HUAWEI_B_0000005804 - DOJ_HUAWEI_B_0000006921
Documents Related to Shipping	Discovery Material	DOJ_HUAWEI_B_0000006922 - DOJ_HUAWEI_B_0000006938
Defendants' Presentation to a U.S. Government Agency	Discovery Material	DOJ_HUAWEI_B_0000006939 - DOJ_HUAWEI_B_0000006960
Information Related to the Entity List	Discovery Material	DOJ_HUAWEI_B_0000006961 - DOJ_HUAWEI_B_0000006982
Corporate Record	Discovery Material	DOJ_HUAWEI_B_0000006983
Public News Article	Discovery Material	DOJ_HUAWEI_B_0000006984 - DOJ_HUAWEI_B_0000006996
Documents Related to Shipping	Discovery Material	DOJ_HUAWEI_B_0000006997 - DOJ_HUAWEI_B_0000006998
Document Related to Syria	Discovery Material	DOJ_HUAWEI_B_0000006999 - DOJ_HUAWEI_B_0000007000
Corporate Records	Discovery Material	DOJ_HUAWEI_B_0000007001 - DOJ_HUAWEI_B_0000007080

Very truly yours,

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cc: Clerk of the Court (AMD) (by ECF)